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June 25, 1998

Received
JUN 25 1998
Common Carrier Bureau
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Geraldine A. Matise, Chief
Network Services Division, CCB
Federal Communications Commission
2000 M Street, N.W., Room 235
Washington, DC 20554

Docket 92-237

RECEIVED
JUN 6 1998
FEDERAL COMMUNICATIONS
COMMISSION

Re: Petition of Virgin Islands Telephone Corporation ("Vitelco") for a Waiver of the
Commissions Rules Regarding Transition to Four-Digit CICs

Dear Ms. Matise:

We want to thank you and members of your staff for allowing the Virgin Islands Telephone Corp. ("Vitelco") the opportunity to meet with you this past Monday (June 22, 1998) and address your questions regarding Vitelco's request for a waiver of the Commission's CIC deadline. We hope that you found the meeting beneficial and that the opportunity to meet and question Mr. Emiel Michiels of Vitelco was helpful to your analysis. This letter clarifies two issues that were raised at this meeting.

First, Vitelco clarifies that it is asking for a waiver of two Commission rules. Vitelco respectfully requests a waiver of the CIC deadline to permit Vitelco to replace its two main switches and their associated remotes in accordance with the phased-in implementation schedule outlined below. In addition, Vitelco requests the Commission to waive its three-digit CIC blocking deadline of July 1, 1998¹ until Vitelco has implemented seven-digit CAC dialing. Permitting Vitelco to continue using the three digit CIC codes will preserve the ability of the U.S. Virgin Island's consumer to use CAC dial-around methods to access the four existing carriers and other carriers with three digit CACs to provide interexchange service to points off of the islands.² Of course, at no time will the ability of consumers to reach alternative carriers via

¹ See Administration of the North American Numbering Plan, Carrier Identification Codes (CICs), CC Dkt. No. 92-237, *Declaratory Ruling*, DA 98-828, at ¶ 20 (rel. May 1, 1998) (permitting carriers to phase-in blocking to be completed by Sept. 1, 1998).

² There is no toll calling between islands as all calls between them are local calls.

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the use of calling cards or "1-800" dialing be affected by this delay in implementing seven-digit CAC dialing.

Second, Vitelco wanted to clarify that, at a minimum, it be permitted to phase in 4 digit CIC code dialing on an island by island basis in order to ensure that customers can understand the dialing procedure. Under this approach, according to the schedule set by Nortel, and St. John will be ready for implementation in January 1999,³ St. Thomas in April of 1999, and St. Croix in November of 1999. Even so, as explained during the meeting, Vitelco would prefer to implement seven-digit CAC dialing all at once in order to avoid the appearance of discriminatory behavior between islands - a sensitive political issue in the U.S. Virgin Islands. However, the company is willing to implement phase-in CAC dialing if the Commission requires Vitelco to do so.

As Mr. Michiels stated in the meeting, the phase-in of seven-digit CAC dialing is best accomplished only after the host switch and all of its associated remotes are converted. While it is technically possible to implement seven-digit dialing after the host and an individual remote is converted, it is virtually impossible to inform customers when their individual remote has been switched because number blocks are not assigned by remote, but at the main switch. That is, each remote may have a variety of different three-digit exchange codes (NNN-####), and two remotes may share the same three-digit code. Thus, it is not possible to simply inform consumers that all customers with numbers beginning with the same three digits (i.e., 735-####) have seven-digit CAC dialing because that exchange may be on two different remotes.

As Vitelco indicated in its waiver petition and in the meeting, permitting Vitelco the time necessary to replace its aging Alcatel switch will permit Vitelco not only to comply with new seven-digit CAC dialing, but will also for the first time to bring SS7 functionality to the islands that will be beneficial to interexchange carriers and customers alike. Vitelco has done everything in its power to rush Nortel along in its schedule for deploying these switches.

As you requested we will be supplying you shortly with an affidavit documenting those steps Vitelco took to push Alcatel to act in a timely manner to perform the software upgrades to implement seven-digit CAC dialing up to and including the time when Vitelco decided to abandon Alcatel's inadequate response to Vitelco's requests to bring its older switches into compliance

³ The remotes in St. John do not need to be replaced and will be able to support seven-digit CAC dialing as soon as the change over of the St. Thomas host is complete.

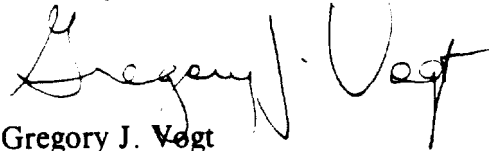
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with FCC rules. This affidavit will also describe in detail those steps and associated timing to replace the host and remote switches during the next 18 months. As requested, we are serving the four existing interexchange carriers that serve the U.S. Virgin Islands with Vitelco's waiver petition, this letter and the affidavit. If there is any other information you require facilitate your analysis of this waiver petition, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Gregory J. Vogt". The signature is fluid and cursive, with the first name "Gregory" and last name "Vogt" clearly distinguishable.

Gregory J. Vogt

Counsel for Virgin Islands Telephone Corp.

cc: Howard Spencer, Jr.
Kris Monteith
Renee Alexander